

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

JESSIE BROWN, CARLOS BROWN,
JEREMY EVANS and VICTOR GARCIA

PLAINTIFFS

vs.

NO.7:23-cv-00182

FRAC SPYDER, LLC

DEFENDANT

**AGREED MOTION
FOR ADDITIONAL TIME TO FILE ANSWER**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Defendant, Frac Spyder, LLC, pursuant to Rule 5, T.R.C.P., and requests that the Court grant Defendant additional time in which to file Defendant's Answer.

I.

The deadline for filing Defendant's Answer was December 20, 2023.

II.

Defendant was unable to file Defendant's Answer for the following reasons, which constitute good cause for the extension of time under Rule 5, T.R.C.P.: late receipt of the Original Petition along with needing additional time to consult additional counsel.

III.

This extension of time is sought so that justice may be done, and not for purposes of delay.

IV.

Granting this request for an enlargement of time to file will not delay the beginning of trial.

V.

Defendant requests until January 15, 2024, to file Defendant's Answer.

WHEREFORE, PREMISES CONSIDERED, Defendant requests the Court to grant until January 15, 2024 to file Defendant's Answer.

Respectfully submitted,

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By: /s/ Matthew French
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**ATTORNEYS FOR DEFENDANT
FRAC SPYDER, LLC**

Certificate of Conference

I certify that I have discussed the merits of this motion with opposing counsel, Sean Short on December 20, 2023, and he indicated that he was not opposed and agreed to the extension of time for Defendant to answer.

/s/ J.D. Benton
J.D. Benton

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of December 2023, the foregoing was served upon the following counsel of record via stand-alone e-service and/ or via electronic mail:

Sean Short
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/s/Matthew French
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